IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

NETRATINGS, INC., Plaintiff, Civil Action No. 05-314-GMS VS. COREMETRICS, INC., Defendant.

STIPULATION AND PROPOSED ORDER

WHEREAS, on June 13, 2006 the Court rescheduled the teleconference regarding whether motion(s) for summary judgment may be filed to September 6, 2006:

WHEREAS, the Court recently entered a stipulated order extending the deadlines for the exchange of opening expert reports from June 30, 2006 to July 31, 2006, and the exchange of rebuttal expert reports from July 21, 2006 to August 18, 2006 (D.I. 118);

WHEREAS, the parties participated in a Markman Hearing on July 6, 2006 before the Court and pursuant to the Court's instructions hereby submit this stipulation to extend the deadlines for service of expert reports, the deadline for the close of expert discovery, and deadlines for the possible filing of summary judgment motions until after the issuance of the Court's Markman ruling. See Markman Tr. at 181-184.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES, SUBJECT TO THE APPROVAL AND ORDER OF THE COURT, THAT:

the date by which opening expert reports are to be served on opposing counsel is 1. extended from July 31, 2006 to 14 days following the issuance and entry on the docket of the Court's

Markman ruling;

- 2. the date by which rebuttal expert reports are to be served on opposing counsel will be 21 days following the service of the opening expert reports;
- 3. the parties will confer to arrange a mutually agreeable deposition schedule for all expert witnesses;
- 4. all expert depositions will be completed no later than 21 days following service of the rebuttal expert reports;
- 5. if the Court grants a party permission to file a motion for summary judgment, the date by which opening briefs and affidavits in support of the summary judgment motion are to be served and filed is extended from July 28, 2006 to a date 14 days after the date on which the Court grants permission to file the motion for summary judgment, with briefing to be completed pursuant to Local Rule 7.1.2.

YOUNG CONAWAY STARGATT & **ASHBY & GEDDES** TAYLOR, LLP /s/ John G. Day By: By: Josy W. Ingersoll (No. 1088) Steven J. Balick (No. 2114) John W. Shaw (No. 3362) John G. Day (No. 2403) Karen E. Keller (I.D. No. 4489) Tiffany Geyer Lydon (No. 3950) The Brandywine Building 222 Delaware Avenue 1000 West Street, 17th Floor P.O. Box 1150 P.O. Box 391 Wilmington, DE 19899 Wilmington, DE 19899 Telephone: (302) 654-1888 Telephone: (302) 571-6600 Facsimile: (302) 654-2067 Facsimile: (302) 571-1253 sbalick@ashby-geddes.com ingersoll@vcst.com jday@ashby-geddes.com jshaw@ycst.com tlydon@ashby-geddes.com kkeller@ycst.com SO ORDERED:

Date

UNITED STATES DISTRICT JUDGE